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ORIGINAL



## CHEYENNE AIRPORT

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U.S. Department of Transportation Dockets  
Docket No. FAA-2000-7479 -49  
400 Seventh Street, S.W.  
Room Plaza 401  
Washington, DC 20590

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DEPT OF TRANSPORTATION  
DOCKETS

To whom it may concern:

On behalf of the Cheyenne Airport, I would like to provide the following comments concerning the proposed re-write of FAR Part 139. The four class structure of airport certification is a great idea. All airports are unique and a class structure recognizes this uniqueness. Obviously, smaller airports, based on more limited resources, would not be able to nor should they be required to meet the more stringent standards imposed on larger facilities.

*Subpart D - Section 139.303, Personnel*

The proposed new language is unnecessary and overly burdensome. There is no benefit achieved with an onerous recurrent training program for everyday activities such as; runway light bulb replacement, safety area maintenance, FOD, signage etc. The very fact that the airport operator must comply with FAR Part 139 ensures the airport operator will provide qualified and trained staff to maintain the airfield. Annual FAA Certification inspections ensure compliance without the need for onerous record keeping and recurrent training programs.

*Subpart D - Sections 139.315 - 139.321, ARFF*

I would urge the position that all 139 certificated airports meet at least the minimum requirements (Index A), subject to limited exemptions. Operators of small airports should work with local firefighting agencies to determine the most economical and efficient means of compliance. This determination should then be included in the airport's emergency plan.

As an employee of a small airport, cross-training is essential in every airport position and ARFF duties can and should be cross-trained thereby minimizing the financial impact.

*Subpart D - Section 139.323, Handling and Storing of Hazardous Substances and Materials*

No Comments

*Subpart D - Section 139.325, Traffic and Wind Direction Indicators*

Support change.

*Subpart D - Section 139.327, Airport Emergency Plan*

I concur with the requirement for Class II, III, and IV airports to hold an annual table-top exercise and not a full-scale tri-annual exercise. In addition, I support the ARAC Commuter Airport Certification Working Group recommendation that Class II, III and IV table-top exercise include a field tour, identification of staging areas, and perimeter security areas to control access to disaster areas.

The remainder of this section I found reasonable.

*Subpart D - Section 139.329, Self-Inspection*

I support the amendment allowing airport operators the ability to designate individuals of their choice to conduct inspections. This amendment is critical; it will allow small airports the ability to economically and efficiently conduct daily inspections. However, the proposal to require a formalized training program for personnel conducting the inspections is unnecessary and overly burdensome. The regulation by itself holds the airport operator responsible, thus ensuring inspections are done correctly. Furthermore, annual FAA certification inspections ensure compliance without the need for burdensome record keeping and recurrent training programs.

*Subpart D - Section 139.339, Wildlife Hazard Management*

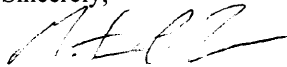
No Comments.

*Subpart D -Section 139.341, Airport Condition Reporting*

Support change.

Thank you for the opportunity to comment on the rewrite. If you have any questions I can be reached at (307) 634-7071 or via email at [lensscys@aol.com](mailto:lensscys@aol.com)

Sincerely,



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